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October 7, 2016

Hon. Debra C. Freeman
United States Magistrate Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Courtroom 17A
New York, NY 10007-1312

Re: **Rosario v. Mis Hijos Deli Corp., et. al.**
CA No. 15-cv-6049 (LTS) (DCF)

Your Honor,

We represent the six (6) defendants in the above referenced matter, including Mis Hijos Deli Corp., Palma Grocery Corp., 251 E. 123rd St. Realty LLC, Jose Palma, Leonida Collado, and Junior Palma. Concurrently with this letter, we have filed motions for summary judgment on behalf of two defendants, 251 E. 123rd St. Realty LLC and Jose Palma, on ECF in accordance with Your Honor's October 7th deadline.

While preparing these two motions it became clear that we have grounds to also move for summary judgment with respect to defendants Palma Grocery Corp. and Leonida Collado. In the interest of judicial economy and preserving judicial resources which would otherwise be spent at trial on matters that can be resolved now, we write to respectfully ask for a one (1) week extension of time to allow us to file a motion for summary judgment on behalf of defendants Palma Grocery Corp. and Leonida Collado.

While defendants have not demonstrated a good reason for missing the motion deadline, the one-week extension is nonetheless granted, in the interest of potentially resolving the claims in this action or streamlining them for trial. The parties are directed to negotiate a schedule for the submission of opposition and reply. The final pretrial conference date remains in place.

Very truly yours,
/s/ Argilio Rodriguez
Argilio Rodriguez, Esq.
Counsel for Defendants

SO ORDERED: DATE: 10/11/16

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DEBRA FREEMAN
UNITED STATES MAGISTRATE JUDGE